

WILMERHALE

November 30, 2022

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Hon. Allison D. Burroughs  
United States District Court  
District of Massachusetts  
John Joseph Moakley U.S. Courthouse  
1 Courthouse Way, Suite 2300  
Boston, Massachusetts 02210

Re: *President and Fellows of Harvard College vs. United States Department of Homeland Security et al.*, 1:20-cv-11283

To the Honorable Allison D. Burroughs,

I am counsel for Harvard University in the above-captioned action, *President and Fellows of Harvard College vs. United States Department of Homeland Security et al.* (the "*Harvard Litigation*").

As you may know, Emily Andersen, your former judicial law clerk, joined Wilmer Cutler Pickering Hale and Dorr LLP ("WilmerHale") on September 26, 2022, as a Senior Associate in the firm's Boston office. Ms. Andersen is a member of the Massachusetts Bar. Ms. Andersen worked on the *Harvard Litigation* while clerking in your chambers from 2020-2021.

Rule 1.12 of the Massachusetts Rules of Professional Conduct (i) bars a former judicial law clerk from representing a client in connection with a matter in which he or she participated personally and substantially while clerking, and (ii) describes notification and screening requirements that must be put in place to ensure that the former judicial law clerk does not share information regarding the matter with others at the firm. We are sending you this letter, which sets out WilmerHale's compliance with the requirements of Massachusetts Rule 1.12.

1. WilmerHale has taken the following steps to screen Ms. Andersen from the *Harvard Litigation*:
  - a. Ms. Andersen has not worked on the *Harvard Litigation* since her arrival at WilmerHale.
  - b. All WilmerHale lawyers and employees have been notified that Ms. Andersen has been screened from the *Harvard Litigation*, that they should not discuss

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the *Harvard* Litigation with her, and that she should not have access to any files concerning the *Harvard* Litigation.

- c. WilmerHale has erected electronic barriers blocking Ms. Andersen's access to all information in the firm's computer network regarding the *Harvard* Litigation.
2. As Ms. Andersen is a salaried employee, she will not share in any fees attributable to the firm's work on the *Harvard* Litigation.

If the Court requires any additional information concerning this matter, please let me know, and we will be happy to provide it.

Respectfully submitted,

WILMER CUTLER PICKERING HALE AND DORR LLP

A handwritten signature in dark ink, appearing to read 'Felicia H. Ellsworth', is written over a horizontal line.

Felicia H. Ellsworth, Partner

cc: All Counsel of Record